



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**ANACONDA-ERICSSON, INC.
SYCAMORE, ILLINOIS
ILD 062 406 608**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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**ENFORCEMENT
CONFIDENTIAL**

EXECUTIVE SUMMARY

Release under 5 U.S.C. § 552 / TQ

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Anaconda-Ericsson, Inc. (A-E, Inc.) facility in Sycamore, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The A-E, Inc. facility manufactured copper and aluminum wire and cable. The facility generated and managed the following waste streams: waste muriatic acid (D002), waste paint (D001), waste mineral spirits (D001), waste varnish (D001), waste chlorinated solvents (F002), waste phosphoric acid (D002), waste laboratory chemicals (waste code not known), waste synthetic oil (nonhazardous) waste polyvinylchloride/polyethylene (waste code not known), and waste wire cut-offs (nonhazardous), waste synthetic oil (nonhazardous). The facility operated at this location from 1890 until 1983. The facility occupies 27.55 acres in an industrial and residential area, and at one time employed as many as 1,000 people. The facility's regulatory status was that of a large-quantity generator and storage facility. Very little information is available about the facility's history and ownership. The facility was in the wire manufacturing business from 1890 to 1983. The area was open land before 1890. The facility was initially called the Chicago Insulated Company. It is not known when the name was changed to Anaconda-Ericsson, Inc. (A-E, Inc.). In February 1983 the A-E, Inc. plant was shut down. A skeleton crew was left to handle the RCRA closure. A certification of closure letter signed by an independent registered professional engineer was submitted to Illinois Environmental Protection Agency (IEPA) on November 16, 1983, and closure was approved by IEPA on April 19, 1984. A-E, Inc. was the operator of the facility. The owner of the facility was Ericsson Radio Systems, Inc., which sold the facility in 1985 to Sycamore Industrial Park Associates, the present owner of the facility. The facility is currently a light industrial park; no hazardous waste activities are taking place on site.

The PA/VSI identified the following two SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Hazardous Waste Storage Building
2. Nonhazardous Waste Storage Area

Area of Concern

1. Underground Storage Tanks

Both SWMUs 1 and 2 have no potential for release to ground water, since the A-E, Inc. facility is inactive and underwent RCRA closure in 1983. There were no documented releases when the facility was operating. AOC 1 has a moderate to high potential for release to ground water, as there are eight underground storage tanks (USTs) which are at least 19 years old, and have no record of being tested.

Both SWMUs 1 and 2 have no potential for release to surface water, since the A-E, Inc. facility is inactive and underwent RCRA closure in 1983. There were no documented releases when the A-E, Inc. facility was operating. AOC 1 has a low potential for release to surface water since the tanks are underground.

Both SWMUs 1 and 2 have no potential for release to air, since the A-E, Inc. facility is inactive and underwent RCRA closure in 1983. There were no documented releases when the facility was operating. AOC 1 has a low potential for release to air, since the tanks are underground and the volatility rate of fuel oil and diesel fuel is low.

Both SWMUs 1 and 2 have no potential for release to on-site soils, since the A-E, Inc. facility is inactive and underwent RCRA closure in 1983. There were no documented releases when the facility was operating. AOC 1 has a moderate to high potential for release to on-site soils, as there are eight underground storage tanks (UST) which are at least 19 years old and have no record of being tested.

Access to the facility was controlled by security guards, although it is not known if they were on duty 24 hours per day. Ground water was used as a drinking and municipal water supply. City

wells are located in the vicinity of the facility to the southwest and east. The nearest well is located **Non-** southwest of the facility. The nearest surface water body, an old gravel pit pond, is located approximately 300 feet north of the facility and is not used for any particular purpose.

RAI recommends that, under proper authority, tank integrity testing or soil sampling be conducted for AOC 1. If any contamination of environmental media is determined, appropriate remedial actions should be taken. RAI recommends no further action for the two SWMUs.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for Anaconda-Ericsson, Inc. (A-E, Inc.).

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Anaconda-Ericsson, Inc. (A-E, Inc.) facility in Sycamore, Illinois. The PA was completed on April 1, 1992. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. RAI also reviewed relevant publications from the U.S. Department of Agriculture (USDA), Illinois State Geological Survey (ISGS), U.S. Geological Survey (USGS), U.S. Department of Commerce (USDC), and the Federal Emergency Management Agency (FEMA). The VSI was conducted on April 3, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. Two SWMUs and one AOC were identified at the facility.

The VSI is summarized and five inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

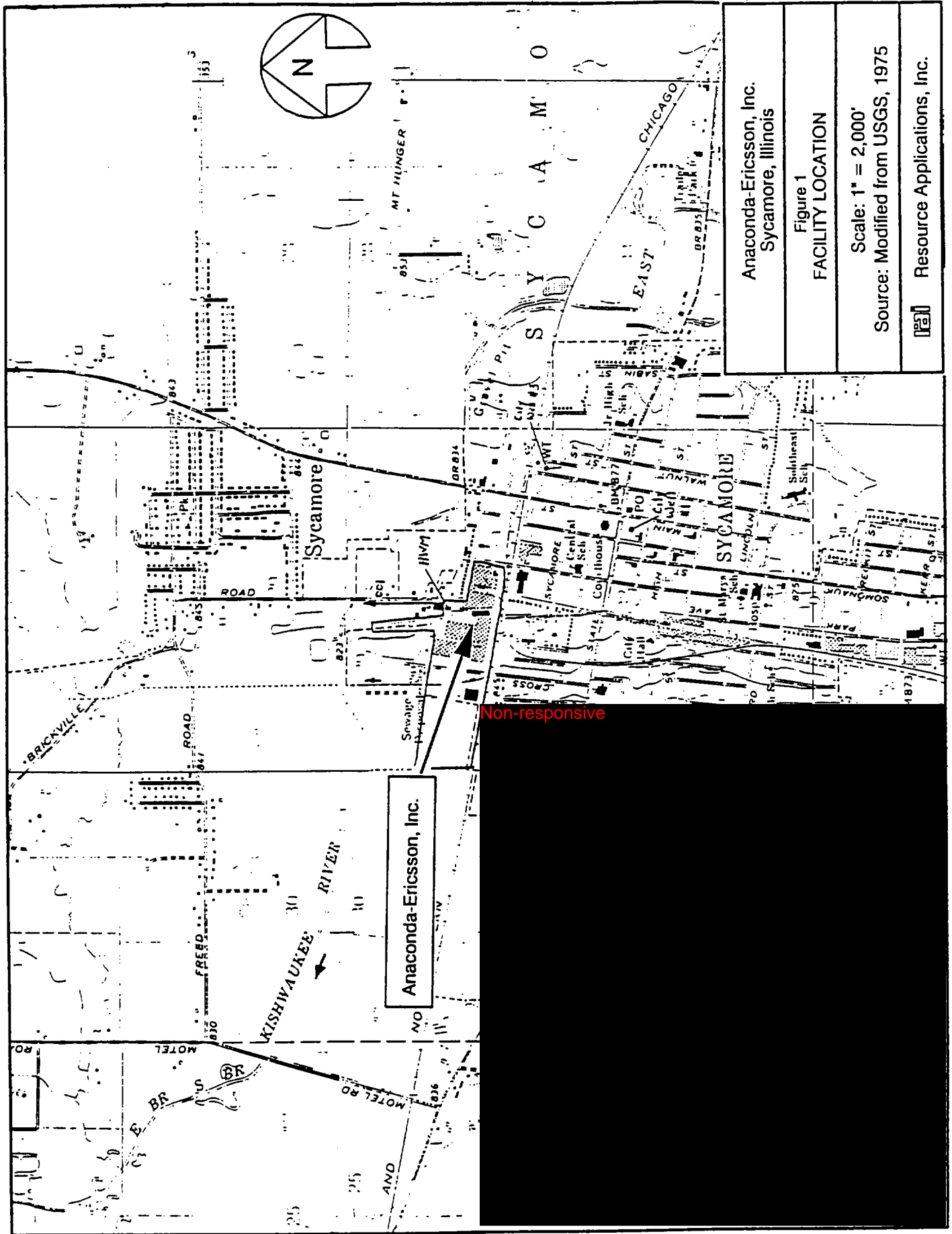
The A-E, Inc. facility is located at 421 North California in Sycamore, DeKalb County, Illinois (latitude 41°59'44" N and longitude 088°41'24" W), as shown in Figure 1. The facility property occupies 27.55 acres in an industrial and residential area.

The facility is bordered on the north by city property, which contains a 7-acre pond (gravel pit filled with water), with one house located between the property and the facility; on the west by a residential area, open land, and Northern Illinois University Engineering School; on the south by a residential area, a handicapped persons training building, and an abandoned railroad line; and on the east by a small residential area, a section of the Kishwaukee River, and light industry.

2.2 FACILITY OPERATIONS

The A-E, Inc. facility manufactured copper and aluminum wire and cable. The process consists of wire drawing (reducing the size or diameter of the wire per specifications) and insulating the wire by an extrusion process. The insulation consisted of polyvinylchloride (PVC) or polyethylene. Some wire was shipped bare and some with a varnish coating. The copper wire process was performed in Building B and was accomplished by drawing (pulling) the wire through various size metal dies. A combination coolant and lubricant solution was used in the drawing operation. It consisted of 60 percent water and 40 percent synthetic oil (with the appearance of "Crisco" or lard). The noncommercial product coolant/lubricant solution was stored in a 3,000-gallon tank adjacent to the drawing operation.

Some of the copper wire went through a tinning operation, which consisted of drawing the wire through a muriatic acid bath for cleaning, through burlap material for a wipe operation, through



Anaconda-Ericsson, Inc.
Sycamore, Illinois

Figure 1
FACILITY LOCATION

Scale: 1" = 2,000'
Source: Modified from USGS, 1975

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"Blackstone" flux (inert), and then through the tinning bath. The flux is used to help the tin adhere to the wire. The tinning operation took place in area 8B as indicated on Figure 2. The muriatic acid was delivered to A-E, Inc. in 55-gallon drums.

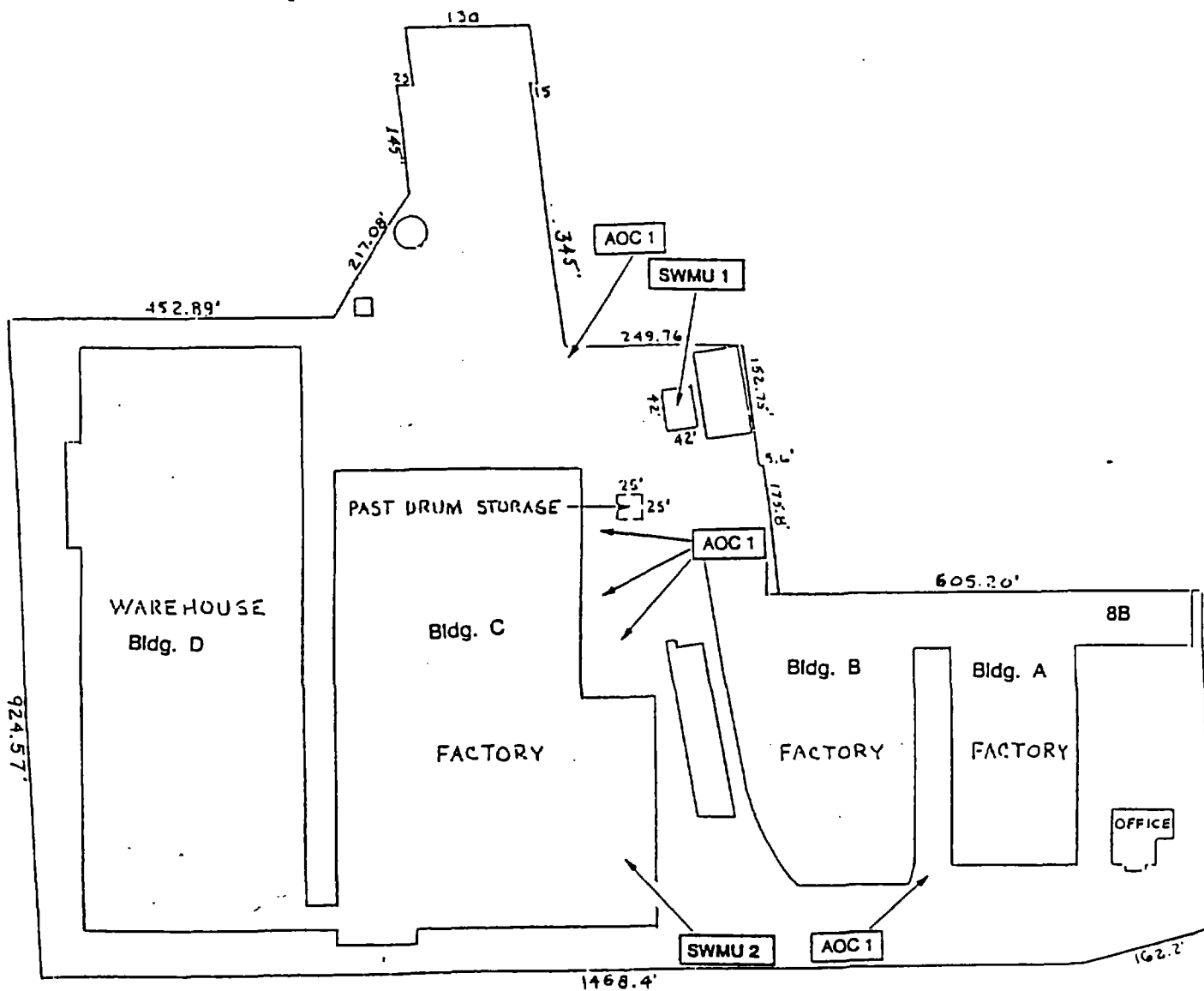
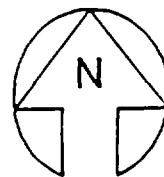
The next step in the operation was the insulation covering which was performed by plastic extrusion. The insulation consisted of PVC (flame retardant) and polyethylene. The PVC and polyethylene were received premixed from Union Carbide. The process consisted of applying heat, melting the plastic, extruding, and cooling.

The aluminum wire process was performed in Building C (west of Building B) and was basically identical to the copper drawing and extrusion-type insulation operation, with some exceptions. The wire drawing operation used petroleum-based oil for the coolant/lubricant.

A-E, Inc. also manufactured magnet wire which was coated with varnish. This wire was used for transformers and alternators. The magnet wire process was performed in Building B from February 1973 to approximately 1979. The magnet wire operation was moved to Carrollton, Kentucky in 1979. The coating operation consisted of drawing the wire through a 2-cubic-foot varnish bath and up through a drying tower where heat was applied by an air-drying operation. This operation would apply about five coats of varnish before completion of the process. After completion of the coating operation, the wire was rewound on a spool and shipped to customers.

There were, and still are, eight Underground Storage Tanks (AOC 1); of which seven are located in the north-central section of the facility, mainly between Buildings B and C. Six of the tanks are said to store fuel oil and one is used for diesel fuel. The other tank is located at the southern end of the property between Buildings A and B. This tank also stored fuel oil. The oil tanks all have a concrete containment area at the fill points.

A-E, Inc. started its operations at this facility in 1890. In 1973 the company employed approximately 1,000 people and operated three shifts per day. The facility consists of seven buildings. Three of the buildings were used for the wire manufacturing process and one was used for storing finished product. One of the remaining three buildings was used for shipping (with a paint spray booth at one end), one was for machine parts storage, and the last building was the Hazardous



Solid Waste Management Units (SWMU)

1. Hazardous Waste Storage Building
2. Nonhazardous Waste Storage Area

Areas of Concern (AOC)

1. Underground Storage Tanks

Anaconda-Ericsson, Inc.
Sycamore, Illinois

Figure 2 FACILITY LAYOUT

Not to Scale
Source: Modified from A-E, Inc., 1980



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Waste Storage Building (SWMU 1), of which half was used for general storage. The facility property consists of 27.55 acres of which 650,000 square feet is under roof. A-E, Inc. ceased operations at the facility in 1983. There is an asphalt parking lot along the south side of the facility. All of the buildings are still in existence, and the facility is presently owned by Sycamore Industrial Park Associates. The buildings are presently under lease to 11 tenants. Facility SWMUs are identified in Table 1. Very little information is available about the facility's history and ownership. The facility has been used for the wire manufacturing business since 1890. Before 1890 the facility property was open land. The facility was initially called the Chicago Insulated Company. It is not known when the name was changed to Anaconda-Ericsson, Inc. In approximately 1979, the magnet wire operation of A-E, Inc. was shut down and moved to Carrollton, Kentucky. In February 1983, the A-E, Inc. plant was shut down. A skeleton crew was left to handle the RCRA closure. A certification of closure letter by an independent registered professional engineer was submitted to the IEPA on November 16, 1983 (A-E, Inc., 1983). Anaconda-Ericsson, Inc. was the operator of the facility. The owner was Ericsson Radio Systems, Inc., who sold the facility to Sycamore Industrial Park Associates in 1985, which is the present owner of the facility. The facility is currently operating as a light industrial park; no hazardous waste activities are taking place on site. Current activities include assembly of compact disk jukeboxes, electronic dartboards, office equipment, and warehouse storage. RAI did not inspect all former manufacturing areas, as access was not available from all the current tenants. However, based on information obtained from former facility representatives, all SWMU areas were inspected.

2.3 WASTE GENERATING PROCESSES

The A-E, Inc. facility manufactured copper and aluminum wire and cable. The facility generated and managed the following waste streams: waste muriatic acid (D002), waste paint (D001), waste paint thinner (D001/F003), waste mineral spirits (D001), waste varnish (D001), waste chlorinated solvents (F002), waste phosphoric acid (D002), waste laboratory chemicals (waste code not known), waste synthetic oil (nonhazardous), waste polyvinylchloride/polyethylene (waste code not known), and waste wire cut-offs (nonhazardous). These wastes were generated during the manufacture of copper and aluminum wire and cable. Wastes generated at the facility are discussed below and are summarized in Table 2. Annual generation rates presented are based on 1980 waste generation data as listed in the RCRA Part A permit application. The annual waste generation rates

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Hazardous Waste Storage Building	Yes	Inactive; RCRA closure approved April 19, 1984.
2	Nonhazardous Waste Storage Area	No	Inactive; RCRA closure approved April 19, 1984.

Note:

- * A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.
-

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit*</u>
Waste Muratic Acid/D002	Tinning Operation	1
Waste Paint/D001	Paint Operation Spool Stenciling	1
Waste Paint Thinner/D001, F003	Paint Operation Spool Stenciling	1
Waste Mineral Spirits/D001	Paint Operation Spool Stenciling	1
Waste Varnish/D001	Magnet Wire Coating Operation	1
Waste Chlorinated Solvents/F002	Parts Cleaning	1
Waste Phosphoric Acid/D002	One-Time Generation During Closure	Flushed to sanitary sewer after rinsing operation and proper pH adjustment
Waste Laboratory Chemicals/Unknown	Testing/ Experimentation	1
Waste Synthetic Oil/NA**	Wire Drawing Operation	Transported directly off site
Dirt and Copper Fines/NA**	Wire Drawing Operation	Transported directly off site

TABLE 2 (Cont'd)
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit*</u>
Waste Polyvinylchloride/Unknown	Extrusion Process	Shipped off site for recycling
Waste Polyethylene/Unknown	Extrusion Process	Shipped off site for recycling
Waste Wire Cut-Offs/NA**	Start/End of Various Operations	2

Notes:

***** Primary management unit refers to a SWMU that currently manages or formerly managed the waste.

****** Nonapplicable (NA) designates nonhazardous waste.

as listed in the Part A permit application are: F002 (1,200 pounds), F003 (3,200 pounds), F004 (5,000 pounds), D001 (15,000 pounds), and D002 (8,000 pounds). The F004 waste code is listed in the Part A permit application, although there is no documentation indicating that an F004 waste stream was managed at the facility. Specific generation rates for the individual waste streams as listed in Table 2 are unknown. The facility's history of waste generation and management, throughout the tenure of the various operations and owners, is unknown. All of the hazardous waste was stored in 55-gallon drums and the drums were stored in the Hazardous Waste Storage Building (SWMU 1). The ultimate disposition of the hazardous wastes generated is unknown, although they were reported to have been shipped off site to a licensed disposal facility. Copper and aluminum wire and cable production consists of wire drawing, reducing the size or diameter of the wire per specification, and insulating the wire with polyvinylchloride and polyethylene through a plastic extrusion process. The waste generated from the extrusion process occurred only during startup of the equipment and this waste was recycled.

A-E, Inc. generated waste muriatic acid (D002) from the tinning operation. This operation consisted of first cleaning the wire by passing it through a bath of muriatic acid, then through a burlap wiping operation, and finally through a tinning bath. The muriatic acid bath generated approximately one 55-gallon drum per month of waste muriatic acid (D002). The tinning bath was dumped out once every 3 months into a 55-gallon drum and then stored in SWMU 1 before it was shipped to a reclaimer.

A-E, Inc. generated waste paint (D001), waste paint thinner (D001, F003), and waste mineral spirits (D001) in a paint spray booth operation. This operation consisted of spray painting stencil-type identification on wire spools. The waste paint (D001) was generated by removing excess paint from the spray booth floor, walls, and empty paint containers. The waste mineral spirits (D001) were generated during the cleaning of paint laden equipment. The wastes were placed into a 55-gallon drum and then stored in SWMU 1.

A-E, Inc. generated waste varnish (D001), from the magnet wire coating operation. The operation consisted of drawing the wire through a varnish bath and then up and through a hot air drying tower. Depending on the requirements, this same operation would be repeated as many as five times. The varnish bath container size was approximately 8 cubic feet. The bath was emptied

quarterly, and the waste varnish was poured into a 55-gallon drum. This waste was stored in SWMU 1.

A-E, Inc. generated waste chlorinated solvents (F002). This waste was generated during parts cleaning operations. The spent solvents were placed in 55-gallon drums and stored in SWMU 1. This waste was transported by Safety-Kleen Corporation with its ultimate disposition unknown.

A-E, Inc. had a one-time generation of waste phosphoric acid which occurred during the plant closure operation. The phosphoric acid was used to clean out various process tanks which went through a water rinsing operation. After proper pH adjustment the rinse water was flushed to the sanitary sewer.

A-E, Inc. generated waste laboratory chemicals. The waste consisted of various combinations of waste chemicals listed in Table 2. The waste was stored in SWMU 1. The size of the storage containers is unknown.

A-E, Inc. generated waste synthetic oil during the wire drawing operation. A solution was used which consisted of 60 percent water and 40 percent synthetic oil with an appearance like "Crisco" or lard. The solution was used as a combination coolant/lubricant for the wire and dies. The dies were made of tungsten carbide/diamonds which came in various sizes depending upon the wire size requirement. The dies were sent to Fort Wayne, Indiana to be polished. The dies made of tungsten carbide lasted about eight hours and the dies made of diamonds and various metal alloys lasted approximately three months. The wire drawing bath, located at the process area, had a capacity of approximately 3,000 gallons. The coolant/lubricating (waste synthetic oil) solution was removed from the tank once each year. The solution was pumped from the tank directly to a tanker truck. The tanker truck would transport it directly to a reclaimer. A mixture of dirt and copper fines which settled out of the solution to the bottom of the tank was scooped out and placed into 55-gallon drums. The drums were immediately removed to railcars which transported them to a reclaiming operation.

A-E, Inc. generated waste PVC and polyethylene during startup of the extrusion process. The purpose of the extrusion process was to insulate the copper and aluminum wire with PVC and

polyethylene plastic covering. The process consisted of applying heat, thus melting the plastic, extruding onto the wire, and cooling. During the initial startup approximately 100 pounds of waste plastic was generated in the form of approximately 8-inch diameter disks. This material was transported to a reclaiming operation in a 37-cubic-foot "Gaylord" type cardboard box. The material was reground and returned to the facility.

A-E, Inc. generated waste wire cut-offs at the start and end of the various wire and cable manufacturing operations. The storage area was located in the southeastern corner of Building C, identified as the Nonhazardous Waste Storage Area (SWMU 2). The waste was stored in 5-foot by 3-foot by 4-foot-high wood boxes which were removed when full, placed in a railcar, and taken to a reclaiming operation.

As initially described above, the ultimate disposition of the wastes is unknown.

2.4 HISTORY OF DOCUMENTED RELEASES

There is no history of documented releases to ground water, surface water, air, and on-site soils, at the A-E, Inc. facility. There was no visual evidence of past releases observed during the VSI.

2.5 REGULATORY HISTORY

A-E, Inc. submitted a Notification of Hazardous Waste Activity to EPA on August 14, 1980 (A-E, Inc., 1980a). The facility submitted a RCRA Part A permit application on November 16, 1980 (A-E, Inc., 1980b). The application listed the following waste codes and capacities: F002 (1,200 pounds per year), F003 (3,200 pounds per year), F004 (5,000 pounds per year), D001 (15,000 pounds per year, and D002 (8,000 pounds per year). The application also listed the process code S01 (container storage). There have been no revisions to the Part A permit application originally submitted on November 16, 1980. The F004 waste code is listed in the Part A permit application, although there is no documentation indicating that an F004 waste stream was managed at the facility. The facility operated as a large-quantity generator and storage facility, storing hazardous wastes for more than 90 days.

A closure plan was submitted to IEPA by A-E, Inc., on February 16, 1983. This closure plan was submitted for the entire facility, which had ceased operations in February 1983. The closure plan was approved on July 8, 1983 with the stipulation that the facility be closed in accordance with the specifications in the approved closure plan and that the closure be certified by an independent registered professional engineer (IEPA, 1983b). The certification of closure letter from the owner and operator was submitted to the IEPA on November 16, 1983. This letter included the certification of closure from the independent registered professional engineer (A-E, Inc., 1983). Closure was approved by IEPA on April 19, 1984, and the status was changed to "Closed Facility" (IEPA, 1984b). It is not known whether the Part A permit was officially withdrawn.

In the past, A-E, Inc. has not had RCRA compliance problems. Inspections were conducted in conjunction with closure activities on April 28, 1983 and April 9, 1984 (IEPA, 1983a, 1984a).

No air permits for the facility were present in the EPA Region 5 files. There was no evidence of any odor complaints from area residents. No information is available regarding sanitary sewer discharge permits. The facility's Part A permit application indicated that the facility was discharging to waters of the United States but there was no documented information indicating that a National Pollutant Discharge Elimination System (NPDES) permit was required.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the A-E, Inc. facility.

2.6.1 Climate

The climate in DeKalb County is typically continental with cold winters, warm summers, and frequent brief fluctuations in the temperature, humidity, cloudiness and wind direction (Ruffner, 1985). The average daily temperature is 48.6°F. The lowest average daily temperature is 10.6°F in January. The highest average daily temperature is 84.9°F in July.

The total annual precipitation for the county is 35.2 inches (USDA, 1978). The mean annual lake evaporation for the area is about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall recorded in the area over the last 25 years is 5.06 inches (Ruffner and Bair, 1985).

The prevailing wind is from the south-southwest and the average wind speed is 10.0 miles per hour. Average wind speed is highest in March at 11.8 miles per hour from the west-northwest (NOAA, 1990). The wind direction and speed were recorded from Rockford, Illinois, also a National Weather Service office, which is located 30 miles to the northwest. The DeKalb weather service substation has no recorded wind information.

In winter, about one-half of the precipitation, or 10 percent of the annual total, falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in summer, rainfall is often locally heavy and variable.

2.6.2 Flood Plain and Surface Water

The A-E, Inc. facility is located in a Zone C flood plain, that is, an area of minimal flooding outside both the 500-year and 100-year flood plains (FEMA, 1983). The nearest surface water body is a pond, with a surface area of approximately 7.5 acres, located approximately 300 feet north of the facility. The pond was originally a gravel pit and is owned by the City of Sycamore. The pond is not used for any recreational or industrial purposes. It is located on city property and there are no industrial buildings on the property. The surface water body does not discharge at any point. There are two other smaller surface water bodies in the area also formed from gravel pits. One of these surface water bodies is to the north of the pond mentioned above and one is to the east. The next nearest surface water body, the Kishwaukee River, is located approximately 1,300 feet northeast of the facility and is used for industrial and recreational purposes. This surface water body discharges into the Rock River, which ultimately discharges into the Mississippi River. Surface water drainage at the facility is through a storm sewer system to the northeast toward the Kishwaukee River. No further description is available for the surface water drainage. There are no other major surface water bodies in the area.

2.6.3 Geology and Soils

The facility is underlain by soils of the Drummer silty clay loam series, which consists of nearly level, poorly-drained soils. The surface layer is black and very dark gray silty clay loam about 18 inches thick. The subsoil is approximately 32 inches thick and is lighter gray silty clay loam. The underlying material is gray and dark brown sandy clay loam and silt loam. The soils are moderately permeable, with high available water capacity; surface runoff is very slow, causing occasional ponding (USDA, 1978).

No site-specific information was available regarding drift or bedrock geology beneath the facility, so regional information is presented below. During the Wisconsin glacial events, the Sycamore area was covered by glaciers. The ice deposited unsorted rock debris in a clay matrix, known as till. The bulk of the glacial deposits in the region are tills, although some glacial outwash and modern stream deposits (sands and gravels) are also present. The exact thickness of the drift deposits is not known, but is thought to be between 100 and 200 feet (Hackett and Bergstrom, 1956).

The uppermost bedrock unit beneath the facility is the Maquoketa Shale of Ordovician age. This consists of green to blue shale with some intercalated limestone and dolomite beds. The Maquoketa unit is thought to be approximately 100 feet thick, and is underlain by the Ordovician Galena-Platteville dolomites and limestones. The latter unit is about 300 feet thick, and is largely dolomite with a shaly band near the middle and some limestone beds in the lower portion. The Glenwood-St. Peter sandstone and Prairie du Chien dolomites, both of Ordovician age, lie beneath the Galena-Platteville unit. Beneath the Ordovician rocks are Cambrian dolomites, sandstones and shales, including the Ironton-Galesville and the Mount Simon sandstones, which are both important aquifers. Precambrian crystalline basement underlies these rocks. The thickness of and depths to the Cambrian and Precambrian rocks are not known (Hackett and Bergstrom, 1956).

2.6.4 Ground Water

No site-specific information was available, so regional ground water information is presented here. Sand and gravel drift deposits are important as a ground water source in some areas, but deposits are scattered and discontinuous. Drilled ground water wells in the Sycamore area obtain

ground water from the Galena-Platteville dolomite, and the limestone and dolomite beds of the Maquoketa unit are locally water-yielding. Deeper wells may draw upon the aquifers of the Glenwood-St. Peter, Ironton-Galesville, and the Mount Simon rock units, although there is a significant reduction in permeability and water quality with depth (Hackett and Bergstrom, 1956)

2.7 RECEPTORS

The facility occupies 27.55 acres in an industrial and residential area in Sycamore, Illinois. Sycamore has a population of about 9,900.

The facility is bordered on the north by city property, which contains a 7-acre pond (gravel pit filled with water), with one house located between the property and the facility; on the west by a residential area, open land, and Northern Illinois University Engineering School; on the south by a residential area, a handicapped persons training building, and an abandoned railroad line; and on the east by a small residential area, a section of the Kishwaukee River, and light industry. The nearest school, Central School, is located about 0.2 mile south of the facility. Facility access was controlled by fences and security guards. It is not known if video monitoring or any other security features were utilized, nor is it known if the security guards were on duty 24 hours per day.

The nearest surface water body, old gravel pit pond, is located approximately 300 feet north of the facility and is not used for any particular purpose. Other surface water bodies in the area include the Kishwaukee River which basically runs east and west but bends somewhat so that it comes within 1,300 feet northeast of the facility.

Ground water is used as a drinking and municipal water supply. The nearest drinking water well (marked #6 on Figure 1) is located Non- southwest of the facility (City of Sycamore, 1992). There are other city wells in the area of the facility, as shown in Figure 1. There is no site-specific information available, but based on the location of the river, the facility, and the wells, it is assumed that the wells are upgradient of the facility. The nearest industrial water well is not known.

Sensitive environments are not located on site. The nearest wetland area is located approximately 2 miles west-northwest of the facility. There are no critical habitats, national parks, or state parks located within 2 miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI observations.

SWMU 1

Hazardous Waste Storage Building

Unit Description:

The Hazardous Waste Storage Building was a separate brick building located on the north-central area of the facility. The building was divided into two parts, of which one-half was used for storing general items, such as large wooden spools, and the other half was used entirely for storing hazardous wastes. The dimensions of the building are 42 feet by 42 feet with a concrete floor and a berm dividing the two halves and berms at the door openings. No floor drains were observed in the building. The process design capacity for the unit is 18,750 gallons or 340 55-gallon drums. (see Photographs No. 1 and 2)

Date of Startup:

The starting date for the unit is unknown, but it is estimated to have been used since at least 1973 (A-E, Inc., 1992).

Date of Closure:

The unit was closed on November 16, 1983 as part of a RCRA facility closure. IEPA approved closure activities on April 19, 1984 (IEPA, 1984b).

Wastes Managed:

The unit managed waste muratic acid (D002), waste paint (D001), waste paint thinner (D001, F003), waste mineral spirits (D001), waste varnish (D001), waste chlorinated solvents (F002), and waste laboratory chemicals (code unknown). The waste was removed from the facility by a licensed disposal firm, but the ultimate disposition of this waste is unknown.

Release Controls:

The unit was inside a building with a concrete floor.

**History of Documented
Releases:**

No releases from this unit have been documented.

Observations:

The unit is closed. No waste remains in the area. No evidence of release was noted.

4.0 AREAS OF CONCERN

RAI identified one AOC during the PA/VSI. This AOC is discussed below; its location is shown in Figure 2.

AOC 1 Underground Storage Tanks

There are eight Underground Storage Tanks (USTs) at the facility. It is estimated that these tanks have been in place since at least 1973. There is no documentation indicating that the tanks have been emptied; they are currently inactive. Seven of the tanks were used for fuel oil and one for diesel fuel. Six of the oil tanks have a common concrete containment area. The other oil tank has its own concrete containment area. The diesel fuel tank does not have a containment area. The pump used for fueling vehicles has been removed. The capacity of the tanks is unknown. The USTs are identified as an area of concern because they are at least 19 years old and there is no documentation indicating that they have been tested recently. There is no evidence of any leak detection devices. According to facility representatives, no closure activities have taken place or are planned for the tanks. The tanks were not addressed in the 1983 facility closure plan.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs and one AOC at the A-E, Inc. facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3 summarizes the SWMUs and AOC at the A-E, Inc. facility and recommended further actions.

SWMU 1 Hazardous Waste Storage Building

Conclusions: The unit formerly stored 55-gallon drums of hazardous waste prior to RCRA closure in 1983. The unit has a no potential for release to ground water, surface water, air, and on-site soils, as all wastes have been removed, the unit has undergone RCRA closure, and no evidence of release was observed. The past potential for release to the environmental media was low, as waste was managed indoors on a sound concrete floor.

Recommendations: RAI recommends no further action for this unit.

SWMU 2 Nonhazardous Waste Storage Area

Conclusions: The unit formerly stored scrap wire in wooden boxes, indoors, on a concrete floor. The unit has a no potential for release to ground water, surface water, air, and on-site soils, as all of the waste was nonhazardous and has been removed. The past potential for release to the environmental medial was low, as the unit was located indoors and managed nonhazardous waste.

Recommendations: RAI recommends no further action for this unit.

TABLE 3
SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Hazardous Waste Storage Building	At least since 1973 to 1983	None	None
2. Nonhazardous Waste Storage Area	At least since 1973 to 1983	None	None
<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Underground Storage Tanks	At least since 1973 to present	None	Under proper authority, conduct tank testing or soil sampling

AOC 1

Underground Storage Tanks

Conclusions:

There is no evidence of any soil testing of the area or integrity testing of the tanks. The tanks were not addressed in the 1983 facility closure. The potential for release to environmental media is detailed below.

Ground Water and On-Site Soils: Moderate to high. There is no evidence of any testing, past or present, hence the tanks could be leaking. Any release would contaminate on-site soils and could affect the ground water.

Surface Water and Air: Low. The units are situated below grade.

Recommendations:

RAI recommends that, under proper authority, tank testing or soil sampling be conducted.

REFERENCES

- Anaconda-Ericsson, Inc. (A-E, Inc.), 1980a. Notification of Hazardous Waste Activity, August 14.
- A-E, Inc., 1980b. RCRA Part A permit application, November 16.
- A-E, Inc., 1983. Letter to IEPA certifying the closure from the owner and operator, and independent registered professional engineer, October 29.
- A-E, Inc., 1992. Telephone discussion (conference call) between attorneys representing A-E, Inc., Art Marshalla (RAI), Alan Supple (RAI), and Joseph Amerin, former employee of A-E, Inc., March 30.
- City of Sycamore, 1992. Discussion by telephone with Lyle Doty of the City of Sycamore Building and Zoning Department in reference to surface water, wells and other environmental factors pertaining to the A-E, Inc. facility.
- Federal Emergency Management Agency (FEMA), 1983. Federal Insurance Program, National Flood Insurance Program, City of Sycamore, Illinois.
- Hackett, J.E., and R.E. Bergstrom; 1956. "Ground Water in Northern Illinois." Illinois State Geological Survey, Circular 207, Urbana, Illinois.
- Illinois Environmental Protection Agency (IEPA), 1983a. Memorandum to File from P.D. Lopinto regarding site inspection, April 28.
- IEPA, 1983b. Letter to Anaconda-Ericsson, Inc. indicating approval of the closure plan for the facility, July 8.
- IEPA, 1984a. Observation Report - RCRA closure verification, April 9.
- IEPA, 1984b. Letter to Mark Valentine, Anaconda Wire & Cable Company from Lawrence W. Eastep, approving closure activities, April 19.
- National Oceanic and Atmospheric Administration (NOAA), 1990. Local Climatological Data: Annual Summary with Comparative Data: Rockford, Illinois
- Ruffner, J.A., 1985. Climates of the States, Vol. 1, Gale Research Co., Detroit, Michigan.
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- U.S. Department of Agriculture (USDA), 1978. Soil Survey of DeKalb County, Illinois. Illinois Agricultural Experiment Station, May.
- U.S. Department of Commerce (USDC), 1968. Climatic Atlas of the United States. U.S. Government Printing Office, Washington, D.C.

U.S. Geological Survey (USGS), 1980. 7.5 minute topographic series: DeKalb, Illinois quadrangle.

ATTACHMENT A
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Anaconda-Ericsson, Inc. (A-E, Inc.)
Sycamore, Illinois
ILD 062 406 608

Date: April 3, 1992

Facility Representatives: Miles Berman, Attorney (A-E, Inc.)
Sean Bezark, Attorney (A-E, Inc.)
Mr. Robert Boey, Partner, Sycamore Industrial Park Associates

Inspection Team: Arthur Marshalla, Resource Applications, Inc. (RAI)
Alan Supple, RAI

Photographer: Alan Supple

Weather Conditions: Calm, sunny, temperature about 40°

Summary of Activities: The visual site inspection (VSI) began at 10:00 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the A-E, Inc. facility's past solid waste generation, and release history. Most of the information was exchanged on a question-and-answer basis. A-E, Inc. representatives were unable to provide the inspection team with any documents. Very little information was available.

The VSI tour began at 1:00 p.m. The inspection team walked through the former facility observing where past manufacturing processes took place. There was one former hazardous waste SWMU, in a small building (SWMU 1). Based on observation, the unit was in good condition, except for some cracks in the concrete floor. It was difficult to observe any possible past releases in the manufacturing area because as many as eleven companies have moved in, on a lease basis, and are all performing their own operations. There was one area of concern which consisted of eight USTs. The USTs are not being used but are still in existence. The tanks have been in place since at least 1973.

The tour concluded at approximately 3:00 p.m., after which the inspection team held an exit meeting with the two attorneys representing A-E, Inc. and the new owner of the facility. The VSI was completed and the inspection team left the facility at 3:30 p.m.



Photograph No. 1

Location: SWMU 1

Orientation: East

Date: 4/3/92

Description: This is the southern half of the Hazardous Waste Storage Building showing the concrete floor (note the bird droppings) and brick walls. Major cracks in the floor are not apparent.



Photograph No. 2

Location: SWMU 1

Orientation: Northeast

Date: 4/3/92

Description: This is the northeastern section of the area used for storage of hazardous waste in drums showing the concrete floor and the berm which divides the building into two parts. Major floor cracks are not apparent.



Photograph No. 3

Location: AOC 1

Orientation: North

Date: 4/3/92

Description: Location of diesel fuel UST with a 9-foot by 18-foot concrete pad at the ground surface. View also shows the location of the former pump used for fueling trucks.



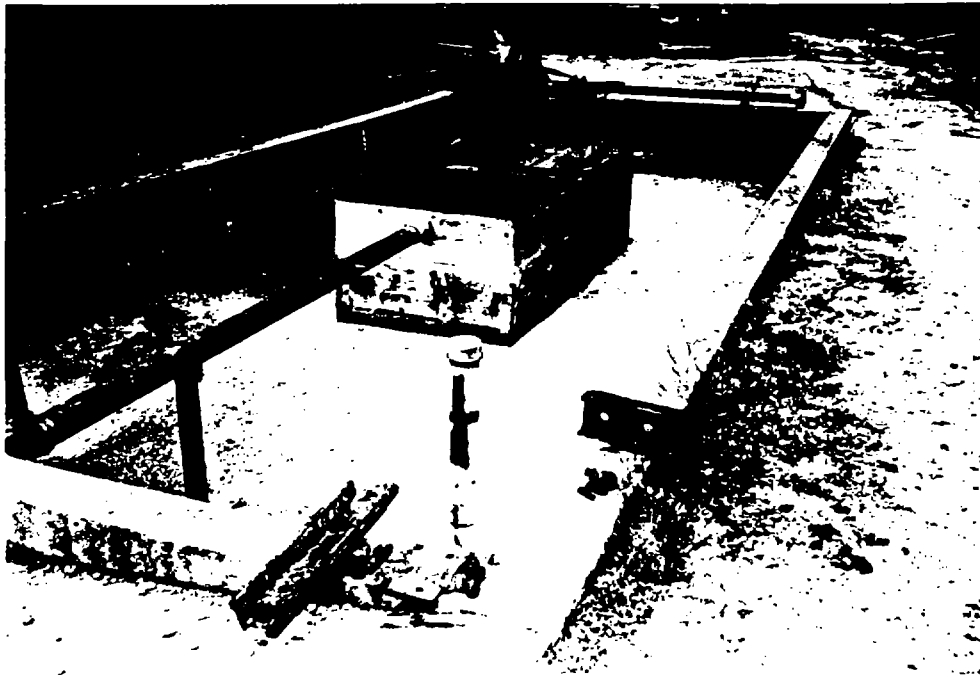
Photograph No. 4

Location: AOC 1

Orientation: North

Date: 4/3/92

Description: Six fuel oil USTs with 25-foot by 25-foot concrete containment area, located in the north central area of the facility.



Photograph No. 5

Location: AOC 1

Orientation: Northwest

Date: 4/3/92

Description: Location of fuel oil UST with a 25-foot by 15-foot concrete containment area.

ATTACHMENT B
VISUAL SITE INSPECTION FIELD NOTES

10:15 a.m.

Anaconda - Ericsson

4/2/92

Robert Boey
John J. Jacky

~ 40°, sunny

Shut down in 1983.

One point 1,000 people employed

Anaconda purchased Chicago Insulated Wire Co.

Owned by Sycamore Industrial Park Associates. Robert Boey is one of partners - there are two. Mid-Kreiger is other partner.

~~1985~~

in 1985

Partner bought facility from Anaconda, - re plans to develop into an industrial park.

11 tenants now.

Over 300 jobs total

650,000 square feet under roof.

35 acres of land.

1983-85 - shutdown crew.

1962-85 worked for Anaconda Engineering Corp. Mgr. of Engineering.

Anaconda Co.

Anaconda Wire & Cable Company

Storm sewer discharges to Kishwaukee River.

City pond - NW

Fencing - 24hr; not known.

As.

Photo Log

≈ 8 USTs

1. NE .. Wash House Cracks in floor Rust stains. Concrete Berm. Floor in good cond

2. E

3. N ? Diesel fuel UST. Concrete pad Pump - lift tank - fueling? Has not changed since. Pad 9' x 18'

4. N Fuel oil USTs - Containment - concrete for spills during fuelling 6 USTs Inactive preserved for heating purposes

5. NW Fuel oil UST - containment 25' x 15'

(11,000 gpg) Sycamore

S - RR & residences to S

W - NW Engineering Sch. across the road Pond on NW

N - Res. on N Ave. NW - Light industry

E - Light industry - Residential.

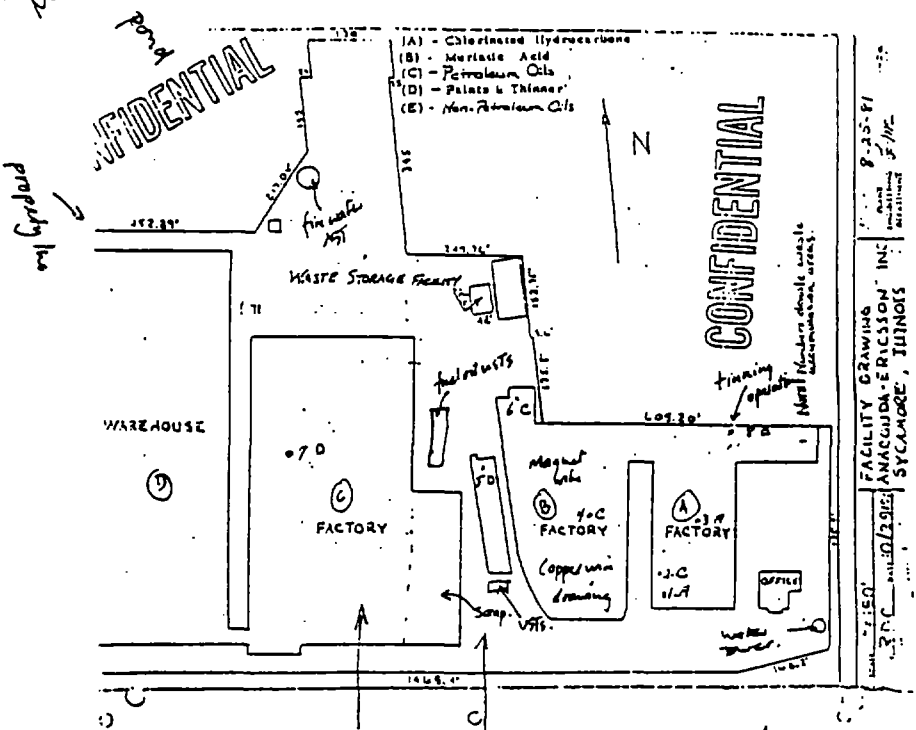
Post 1985

AS

Post 1985 - 1987

Notes
Allan's Notes

• Allan's Notes



Al wire drawing
Copper & Al insul, bare, tin coated.
Segregated into galvalume, wooden
plastic.
Very quick turnaround. Cardboard boxes into train.
Listner - copper reclaimers

8-25-81
FACILITY DRAWING
ANACONDA-ERICSSON INC.
SYCAMORE, ILLINOIS

F002

F004

F017 - paint-related

F003

halogenated solvents
chlorinated & non-chlorinated

D001

D002

Copper & Al wire & cable

S01 18,750 gal

T01 500 gal (should be S02 ??) never had

LD 062 406 608

S01 - 55-gal drum 18,750 (300 drums)

Closure Plan - March 28, 1983 REJECTED

Grease & petroleum from wire drawing

American Waste Processing - Maywood IL

2 8,000 gal

1 6,000 gal

tanks for grease. (B)

Underground pit containing oil pumped. (B)

20 galb. of thinner in spray booth. (B)

Lab.

(C) 250 gal tanks of motor oil 13 drums.

(C) 3 Phosphoric acid tanks (4' x 4' x 4')

+

AS

10th Friday

Joe
Miles

Wire manuf. plant since ~~1920~~ 1890

Feb 1978... 3 prod

✓ Magnet wire: Cu & Al coated with varnish, enamel tin
for transformers & alternators

✓ Cu & Al wire: Com. Ed wire. Either coated or not
(outside)

Inside wire:

✓ Some bare copper & Al wire went out.

✓ Some P.V.C., polyethylene, varnishes, enamels.

VSTs Mos...
PCBs - transformer
Asbestos...
Company split up - magnet wire op
facility moved to Carrollton TX 1978-79

✓ Mos... Copper conductor drawn

Wire drawn through a varnish bath

Wire pulled up through tower - apply heat (warm air in tower) dries

coating 4-5 x coating & drying

Rewind on other spools - Shipped

from the Cleanup times - change bath

Solvents generated from cleaning out - Mineral spirits

55-gallon drums - No idea of rate of generation

Taken to "Wax House"

Copper drawing soln - water & synthetic oils (not petrol. based) 69% water

used to be water & animal fat

5

A3

Scrap wire - cut-offs sent to a recycler - reclaimed.

Wooden boxes 5' x 3' x 4' tall. Put in scrap area.

Smelter bath - kitchen sink size.

1977 - moved mur. acid → went to Blackstone flue. Became inert after use.

Tin coating: Muriatic acid.

Bare copper off spool. Through a roller into tank of mur. acid. Wiped on a burlap blotter. Then dipped ^{molten} into tin.

Replace burlap & tank.

55G drums of muriatic acid. Not a big volume item. Mur. drums stored in wax house.

Burlap - not known disposal method. → not known.

clinker (waste stream).

Tin draft sent to a recycler.

Miss. Scoop tank out into 55G drum. Came out as a solid.

Not sure how it was managed.

Accumulate a drum's worth.

Dump the tank every 20. off (quantity) + continual skimming.

A lot starts off same way - drawing.

Drawing

Copper - ⑧ - Copper rod reeled on railcars. Wire pulled down into different dies & shapes. Wire drawing solution (90% ish synthetic). Looks like "Crisco". R.H. Miller & Apex supplied synthetic oils.

PR → Phila PA

Very large wire drawing solution tank 3,000 + gallons

Copper sludge -

1 yr - removed bottom of tank. Solids settling pit.

55 gall drum to copper refiner. Dirt & copper ~~ref~~ fines.

Copper went straight out in railcars

Solution - used as a coolant for drawing process

Die cleaning

lubricant

Dies - tungsten carbide
diamonds

} - drawing dies.. Last 6-8 hours
Last 3 months

Send dies out to be polished.

Fort Wayne Wire Die, Ft. Wayne, IN.

Either shipped as bare wires ^{inside (flame retardant)}

or (A) - PVC insulation

(B) - polyethylene insulation

→ outside

} apply heat, melt & extrude

Receive premixed PVC & pe from Union Carbide

Bleedout - melting down - initial startup - collect in ≈ 100 lbs

About size of wastebasket. "Cow droppings."

40" x 40" x 40"
galvanized box.

Sent to reclaimers in ^{cardboard} boxes - 1 box per wk.

↓
don't recall name

Chop it up, reground - send back in useful form

When coated - sent out to customer

May twist wire together

Aluminum

Drawn in Building C

Petroleum-based oil used as lubricant and coolant

About 3,000 gallons

Tank cleaned out approx every 2 yrs

No sludge to remove

Air hose in bottom of oil tank. Compressed air used to agitate dirt for pump out.

May go out cable twisted, bare or insulation.
Same PVC - polyethylene coating process.

to Facclosed Feb 1983
Left March 1984.

... Mr. acid in 55 gal drums.

... No bulk storage of oil.

... Come in tank trucks.

... No underground storage.

... Fuel oil tank - underground. Number & size not known.

... Boilers - nat. gas or oil.

... Not known whether removed.

... City Water & sewer. Sycamore obtained water from Illinois.

... No WWTs.

... City sewer.

... Plugged drain.

... Sanitary sewer.

... No idea about NPDES.

... Kishwaukee River.

... No releases that he has heard of.

... Chicago Insulated Wire Co. - way back.

... Up around 1,000 people in 1945 ish.

... 500-600 employees in 1973 ^{8hr} 3 shifts Sat & Sun opt. depending on work schedule.

... 1982 - approx 200 to 250 employees.

AS

3/3/92
• Visit:- American Bare Conductor, Inc.

Closed Facility:- 1993 @ 1-yr-1000 people.

1990 - Chicago Insulated Wire, Inc. Co.

^{no. days}
1992 to closure.

Anacosta - Ericsson, Inc. - Closed 1983

By 1985 Sycamore Industrial Park - Present

35 Acres - 650,000 ft² Under Roof.

8 - UST (Before 1985).

~~Red~~ Pit - Wax House - Concrete Floor (Elev. S. of Hwy. 600 ft)
Barns & Walls (Southern Half of Barn)

-2-

① Copper Wire (South part of Factory B)

Comp. Writing

Drum - 50 L.
C17.45 / 409.5 g Alkyl (Crude) - Rodent/Lubricant

Atalapha *Rubus*

Large Tank r/ Waste empty
once each year & pumped
out — } Liquid pumped to Tank Truck
Copperhead - 50 Gal. Residue
sludge. sent direct to
Refinery.

(2) Copper \rightarrow to Client $D \rightarrow A$ Inside (Flame Retardant)
(insulating) or Factory $A = PVC$ \rightarrow $C =$ Polyethylene Insulation

• Blowed Out Waste Stream (Initial Stand-up) ✓

$$100^{\text{th}} \text{ est } \text{start} = y_0 - \frac{P_{\text{start}}}{Q_{\text{start}}} \quad \text{Estimate } y_0 \text{ and } y_1 \text{ (approx } 1 - 0.001) \text{ - } \frac{P_{\text{start}}}{Q_{\text{start}}}$$

CU/146

Aluminum \rightarrow Bilgic \rightarrow Drawing

-H.-W.-v.-Drems-

Petroleum Based Oil → For Cooling/Lubrication

Fault → at last one taken
very young.

Standard / PVC Poly } same as Copper wire
Insulation

FLWD - Transportation
Maywood - 1929 and On

- Safety Klem - Solvents

Part C - Close

- 454 -

A-E, Inc.

• Chlorinated H.C. —?

• Bulk Storage / Oil Storage (Products) — No Storage on S.

Fuel Oil Tanks Underground — Seen?

Removed —?

Spills — None.

• Used City Water — From Sycamore (Wells)

W.W.T.S. — No ^{sanitary}

Discharge to Storage. (Floor Drains Plugged)

Old Run-off —?

K. S. Washers. None.

Anacanda-Ericsson, Inc.

3/30/92.
(By Pina)

- Conference Phone Call w/ Joe Amerin (Former A-E Ins. Employee)
+ Attorney.

- Call is in Reference to Site Information @ A-E, Inc.

- Products Manufactured - Copper/Aluminum Insulated Wire/Cable.

- Manufacturing Process Consists of: Drawing/Stranding/Insulating.

Magneta - Draw Wire - Coat w/ Vonnish Bath. thru
Towers (dryers)

- Orange Varnish/Enamel
- Solvents
to S.S. Galv. Drums
quarterly

B^c Magneta Wire

Copper Drawing Soln. - Water/Synthetic Oil (Liquor)

Sold Magneta - 1979 - Cordell, Kentucky

- Wire Cut Offs - 6' x 3' x 4' tall Load Boxes - Rail Cars / over
Reclamation

- Tinning Operate - 80 - Muriatic Acid - 1972 started &
went to Blackstone Hwy (I-65 - 41)

